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**From:** Keigwin, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=151BAABB6A2246A3A312F12A706C0A05-RICHARD P KEIGWIN JR]  
**Sent:** 6/29/2017 11:07:25 AM  
**To:** Charlotte Sanson [charlotte.sanson@bayer.com]  
**Subject:** RE: Update - IFT in Soybeans

Thanks Charlotte. I just wanted you to know that I'm being briefed on this next Thursday. I should be able to chat with you on Friday, July 7<sup>th</sup>, if that works for you.

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**From:** Charlotte Sanson [mailto:charlotte.sanson@bayer.com]  
**Sent:** Friday, June 23, 2017 4:18 PM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Subject:** Update - IFT in Soybeans

Hi Rick,

As discussed earlier this week, we have been working to refine the ecological risk assessment for the proposed isoxafluotole soybean use. An overview is attached for your review. Our scientific experts have made significant efforts to refine the risk assessment using a conceptual model that EFED proposed during a SETAC meeting, incorporating a practical approach based on realistic assumptions supported by literature. We strongly feel these refinements lead to a label that is protective of endangered plants, and we appreciate EFED's full consideration. We are forwarding this same information to RD and EFED, and have reached out to schedule a meeting for next week to discuss in more detail.

The second document contains a list of incentives available to growers via NRCS (I recall you mentioned this program when we talked). Bayer is designing a stewardship program, and considering opportunities to bring this concept into the program with input from USDA.

A final document to follow will be the updated weight of evidence, which we intend to provide early next week (also in review with USDA).

Thank you for your continued support. I will follow up with you by phone early next week.

Freundliche Grüße / Best regards,

Charlotte Sanson  
VP, Regulatory Affairs & Compliance, Crop Science

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